

GROUP EXHIBIT 1

MAYER, BROWN, ROWE & MAW

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March 20, 2002

Camie J. Swanson-Hull, Commissioner
Abby R. Gray, Administrative Law Judge
Indiana Utility Regulatory Commission
302 W. Washington St., Suite E-306
Indianapolis, IN 46204-2764

Re: Cause 40611-S1, Errata to Phase I Exceptions and Reply

Dear Commissioner Swanson-Hull and Judge Gray:

Ameritech Indiana hereby makes the following "errata" correction to its Exceptions and Reply to CLECs' Proposed Order in Cause 40611-S1 (Phase I). On page 19, in the last full paragraph, first to fourth lines, the text should be corrected as follows:

"Where the CLECs do accurately state the record, for instance in their reporting of the UNE-P installation charges of \$23.09 and \$17.82 in Texas and Michigan respectively, the data prove the absurdity of the NRCM proposal of \$0.25. In fact, the ~~approved~~ figures that the CLECs cite ~~is~~ ~~are~~ 92 and 71 times as much as the CLEC proposal here."

Sincerely,

J. Tyson Covey

cc: Service List

March 21, 2002

By Overnight Delivery

Camie J. Swanson-Hull, Commissioner
Abby R. Gray, Administrative Law Judge
Indiana Utility Regulatory Commission
302 W. Washington St., Suite E-306
Indianapolis, IN 46204-2764

Re: *In the Matter of the Commission Investigation and Generic
Proceeding on Ameritech Indiana's Rates for Interconnection,
Service, Unbundled Elements and Transport and Termination
Under the Telecommunications Act of 1996 and Related Indiana
Statutes*
Cause No. 40611-S1

Dear Commissioner Swanson-Hull and Judge Gray: .

AT&T Communications of Indiana, GP and TCG Indianapolis, Z-Tel
Communications, Inc., McLeodUSA Telecommunications Services, Inc. and WorldCom,
Inc. (collectively, the "CLECs") hereby respond to Ty Covey's letter of March 20, 2002
regarding Ameritech's proposed "errata" corrections to its February 1, 2002 Exceptions
and Reply to CLECs' Proposed Order.

The CLECs respectfully submit that the proposed redactions, tendered a full *seven*
weeks after the filing of Ameritech's Exceptions and Reply, are not "errata" corrections.
Notably, the changes do not correct typographical errors in the cited figures, but rather
eliminate them altogether, effectively negating Ameritech Indiana's concession of the
accuracy of the CLECs' recitation of the UNE-P installation charges in Michigan.
Ameritech's "errata" corrections are not intended to clarify the accuracy of the record in
Indiana as to these prices, but are instead geared at impacting certain pending Illinois
disputes by "erasing" an admission made by Ameritech in this Indiana pleading and
subsequently raised by the CLECs in Illinois.

For this reason, the CLECs urge the Commission to reject Ameritech's proposed
"errata" corrections and retain the current language in Ameritech's Exceptions and Reply.

WORLDCOM

Very truly yours,

A handwritten signature in cursive script, reading "Deborah L. Kuhn".

Deborah L. Kuhn

Encl

cc: Ty Covey, Counsel for Ameritech Indiana
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March 21, 2002

Commissioner Camie J. Swanson-Hull
Administrative Law Judge Abby R. Gray
Indiana Utility Regulatory Commission
302 W. Washington St., Suite E-306
Indianapolis, IN 46204-2764

Re: Cause No. 40611-S1 - Reply to CLEC Response on Errata Letter

Dear Commissioner Swanson-Hull and Judge Gray:

The CLECs' response to Ameritech Indiana's errata letter of March 20, 2002 is puzzling. They urge "rejection" of the errata because it would prevent them from misrepresenting in other states the content of Ameritech Indiana's brief regarding a Michigan rate that is not even at issue here. That is not a legitimate basis for an objection. Ameritech Indiana simply removed certain language in its Exceptions and Reply – it did not add or change anything or create anything new for the CLECs to respond to – in order to improve clarity and to correct a misinterpretation of the deleted language that the CLECs have attempted to use in other states.¹ Moreover, the deleted language bolstered Ameritech Indiana's argument here, so removing it causes absolutely no prejudice to the CLECs or any other party with respect to any issue in this case. The CLECs have not presented any basis for rejecting a completely non-prejudicial errata.

Sincerely,

J. Tyson Covey

cc: Service List

¹ Specifically, Ameritech Indiana has never "admitted" – and does not admit – that the nonrecurring installation charge for a UNE-P in Michigan is \$17.82. Rather, Ameritech Indiana's brief simply (i) referred to the CLECs' recitation of the Michigan rate in "the record," and (ii) argued for rejection of the CLECs' Indiana rate proposal even based on that representation. However, because the CLECs have now attempted in other states to mischaracterize Ameritech Indiana's argument as a "concession" regarding the Michigan rate (though how Ameritech Indiana could "concede" that a rate is something other than what it actually is remains a mystery), an errata is necessary to prevent further misinterpretation.